



Omaha's Reliable Heating & Cooling Services

77

REC'D

SEP 02 2010

APCO

August 31, 2010

Region VII EPA - Air & Waste Management  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101-2907

Re: Initial Notification Form for 40 CFR Part 63 Subpart ZZZZ  
Energy Systems Company  
25<sup>th</sup> and Burt Streets  
Omaha, NE 68178  
Facility ID# 63464

Dear Madam or Sir:

Energy Systems Company operates a generator at the facility, which is located at 25<sup>th</sup> and Burt Streets, Omaha, Nebraska, for Creighton University. The generator may be subject to 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE), promulgated on June 15, 2004, January 18, 2008, March 3, 2010 and August 20, 2010. An Initial Notification Form for the generator is enclosed with this letter.

If you have any questions regarding this notification, please call me at (402) 346-9066.

Sincerely,



Ken Flegle, P.E.  
Operations Manager

Enclosure:

Cc: John Mayne, Omaha Air Quality Control, 5600 South 10<sup>th</sup> Street, Omaha, NE 68107 (1)  
Terracon Consultants, Inc., 15080 A Circle, Omaha, NE 68144 (1)



NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY  
Air Quality Division

INITIAL NOTIFICATION FORM

**Applicable Rule:** 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) - Promulgated 6/15/04, 1/18/08, & 3/3/10

Company Name \_\_\_\_\_ ENERGY SYSTEMS COMPANY Facility ID# \_\_\_\_\_ 63464  
Owner/Operator/Title \_\_\_\_\_ TODD JOHNSON, PRESIDENT  
Mailing Address \_\_\_\_\_ 25th AND BURT STREETS  
City \_\_\_\_\_ OMAHA, NE Zip \_\_\_\_\_ 68178  
Plant Address (if different than owner/operator's mailing address):  
Street \_\_\_\_\_ 2152 HOWARD STREET  
City \_\_\_\_\_ OMAHA, NE Zip \_\_\_\_\_ 68102  
Plant Phone Number \_\_\_\_\_ 402-346-9066  
Plant Contact/Title \_\_\_\_\_ KEN FLEGLE, OPERATIONS MANAGER

This form must be completed, signed and submitted to the following agencies:

NDEQ Air Quality Division  
1200 'N' St. Atrium, Suite 400  
Lincoln, NE 68509-8922

and

Region VII EPA – Air & Waste Management  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101-2907

If your facility is located in Omaha or Lancaster County, you must submit a notification to the appropriate air pollution control agency in that area and Region VII EPA.

Provide the following information for the applicable stationary engine(s). Add additional tables or rows as needed.

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
EU-6	1976	282	2.44	Diesel Fuel	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES *Note	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES

\* NOTE: THE GENERATOR IS AN EXISTING COMPRESSION IGNITION INSTITUTIONAL GENERATOR. HOWEVER, BASED ON THE DEFINITION OF EMERGENCY STATIONARY RICE IN THE 8-20-10 VERSION OF SUBPART ZZZZ, IT IS NOT CLEAR WHETHER THE GENERATOR IS AN INSTITUTIONAL EMERGENCY STATIONARY RICE. 1 of 2

ENERGY SYSTEMS COMPANY IS STILL RESEARCHING THE STATUS OF THE GENERATOR AND WILL COMPLY WITH SUBPART ZZZZ REQUIREMENTS, AS APPLICABLE.

08-012  
Revised 5/19/10

Unit #	Engine Startup Date	Site Rating Brake Horsepower	Displacement (liters/cylinder)	Fuel(s) Combusted	Compression Ignition	Spark Ignition	Emergency	Limited Use
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES
					<input type="checkbox"/> YES	<input type="checkbox"/> 4-Stroke <input type="checkbox"/> 2-Stroke <input type="checkbox"/> Lean Burn <input type="checkbox"/> Rich Burn	<input type="checkbox"/> YES	<input type="checkbox"/> YES

**Source Classification - Check the box that applies:**

- ☐ Facility is a major source of hazardous air pollutants (HAPs).\*  
☒ Facility is an area source of HAPs.\*

*\*Note: A major source is a facility that has a potential to emit greater than 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line.*

Is the engine(s) a new/reconstructed emergency or limited use engine and > 500 horsepower located at a major source of HAP ? ☐ Yes ☒ No

*If YES, the engine(s) does not have any additional requirements under Subpart ZZZZ, but you must meet the requirements of 40 CFR Part 60 New Source Performance Standards Subpart IIII for Compression Ignition Engines or Subpart JJJJ for Spark Ignition Engines .*

**Source Type - Check the box that applies:**

- ☐ New Source\*  
☒ Existing source\*

*\*Note: To determine if you are a new or existing source, see the attached information following this form.*

**Print or type the name and title of the Responsible Official for the facility:**

**Name:** \_\_\_\_\_ TODD JOHNSON

**Title:** \_\_\_\_\_ PRESIDENT

A Responsible Official can be:

- The president, vice president, secretary, or treasurer of the company that owns the plant;
- An owner of the plant;
- A plant engineer or supervisor of the plant;
- A government official, if the plant is owned by the Federal, State, City, or County government; or
- A ranking military officer, if the plant is located at a military base.

**I CERTIFY THAT INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.**

\_\_\_\_\_  
(Signature of Responsible Official)

8/31/2010  
(Date)